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FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
JUL 17 2017	
CLERK US DISTRICT COURT	
DISTRICT OF NEVADA	
BY: _____	DEPUTY

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,
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13 Plaintiff,
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15 v.
16 MARCO ANTONIO REYES,
17 Defendant.

Case No. 2:12-cr-00076-LDG-CWH
Case No. 2:17-cr-215-JAD-NJK
(magistrate case 2:16-mj-828-VCF)

STIPULATION TO CONSOLIDATE
CASES

(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre,
18 Acting United States Attorney, and Elham Roohani, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Monique Kirtley, Assistant Federal Public Defender, counsel for Marco Antonio Reyes, jointly
21 move the Court to consolidate the above captioned cases under a single case number, preferably
22 2:17-cr-215-JAD-NJK.

23 This Stipulation to Consolidate is entered into for the following reasons:

24 1. On December 20, 2016, Mr. Reyes made his initial appearance on a revocation
25 of supervised release petition in Case No. 2:12-cr-00076-LDG-CWH. In addition to the
26 revocation of supervised release petition, Mr. Reyes has a pending Sealed Criminal Complaint

1 in Case No. 2:17-cr-215-JAD-NJK (magistrate case 2:16-mj-828-VCF). The revocation of
2 supervised release hearing is currently set for August 28, 2017 at 10:00 am. The initial
3 appearance, change of plea and waiver of indictment on the sealed criminal complaint is
4 currently set for August 1, 2017 at 9:00 am. The violation of supervised release petition and
5 the sealed criminal complaint allege the same criminal conduct.

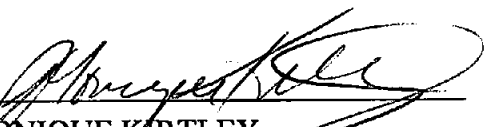
6 2. The parties have negotiated a global resolution in the revocation petition 2:12-
7 cr-00076-LDG-CWH and in the pending sealed criminal complaint 2:17-cr-215-JAD-NJK
8 (magistrate case 2:16-mj-828-VCF). Because the sealed criminal complaint and revocation of
9 supervised release petition are inextricably linked they should be consolidated. Additionally,
10 the interests of judicial economy and efficiency would be served by joining the matters.

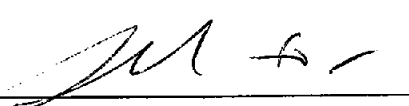
11 3. The parties respectfully request that Mr. Reyes's supervised release hearing
12 before Judge Lloyd D. George be vacated and reset before Judge Jennifer A. Dorsey.

13 DATED this 14th day of July, 2017.

14
15 RENE L. VALLADARES
Federal Public Defender

STEVEN W. MYHRE
Acting United States Attorney

16
17 By 
18 MONIQUE KIRTLEY
19 Assistant Federal Public Defender

By 
20 ELHAM ROOHANI
21 Assistant United States Attorney
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4 Plaintiff,

5 v.

6 MARCO ANTONIO REYES,
7 Defendant.
8

Case No. 2:12-cr-00076-LDG-CWH
Case No. 2:17-cr-215-JAD-NJK
(magistrate case no. 2:16-mj-828-VCF)

PROPOSED ORDER

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10 ORDER

11 IT IS ORDERED that the two cases 2:12-cr-00076-LDG-CWH and 2:17-cr-215-JAD-
12 NJK (magistrate case no. 2:16-mj-828-VCF) be consolidated and combined before the
13 honorable Judge Jennifer A. Dorsey.

14 IT IS FURTHER ORDERED that the Revocation Hearing currently scheduled for
15 August 28, 2017, at the hour of 10:00 a.m. before Judge Lloyd D. George, be vacated and
16 continued to August 1, 2017 at the hour of 9:00 a.m. before Judge Jennifer A. Dorsey.

17 DATED this 18th day of July, 2017.

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19 UNITED STATES DISTRICT JUDGE
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